

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

METROPOLITAN LIFE INSURANCE  
COMPANY, a New York corporation,

Plaintiff,

vs.

ACDF, LLC, a California limited liability  
company, *et al.*,

Defendants.

Lead Case No. 1:24-cv-01261-KES-SAB

Consolidated with Case Nos:  
1:24-cv-01226; 1:24-cv-01230; 1:24-cv-  
01231; 1:24-cv-01232; 1:24-cv-01233; 1:24-  
cv-01235; and 1:24-cv-01241

**STIPULATION AND ORDER BETWEEN  
RECEIVER AND MARICOPA  
DEFENDANTS TO EXTEND TIME FOR  
FILING OF REPLIES IN SUPPORT OF  
MOTION FOR APPROVAL OF SALE  
PROCEDURES**

- Affects All Cases
- Affects Metropolitan Life Ins. Co. v.  
ACDF, LLC, et al., 1:24-cv-01261
- Affects Metropolitan Life Ins. Co. v.  
FNF Farms, LLC, et al., 1:24-cv-01226
- Affects Metropolitan Life Ins. Co. v. C  
& A Farms, LLC, et al., 1:24-cv-01230
- Affects Metropolitan Life Ins. Co. v.  
Maricopa Orchards, LLC, et al., 1:24-  
cv-01231
- Affects Brighthouse Life Ins. Co. v.  
Kamm South, LLC, et al., 1:24-cv-  
01232
- Affects Brighthouse Life Ins. Co. v.  
Manning Avenue Pistachios, LLC, et  
al., 1:24-cv-01233 Case No. 1:24-cv-  
01233
- Affects Brighthouse Life Ins. Co. v.  
ACDF, LLC, et al., 1:24-cv-01235
- Affects MetLife Real Estate Lending,  
LLC v. Panoche Pistachios, LLC, et  
al., 1:24-cv-01241

1 Phillip Christensen, the Court-appointed Receiver in the above captioned case (the  
2 “Receiver”), and the Maricopa Defendants (as defined in the Statement of Position in Response to  
3 Ex Parte Application for Approval of Sale Procedures, Doc. 106 (the “Statement”)) hereby  
4 stipulate as follows:

5 **Background**

6 1. On February 19, 2025, the Receiver filed the Receiver’s Motion for Approval of  
7 Sale Procedures, Doc. 101 (the “Motion”).

8 2. The Court set the Motion for hearing on March 3, 2025, with oppositions due by  
9 February 26, 2025, and replies due by March 1, 2025.

10 3. The Statement was filed by the Maricopa Defendants on February 26, 2025.

11 4. On February 27, 2025, the Court sua sponte continued the hearing on the Motion to  
12 March 10, 2025.

13 5. The Receiver and the Maricopa Defendants have ongoing discussions relating to  
14 the Receiver’s Motion and the Maricopa Defendants’ Statement.

15 6. In light of these facts, the Receiver and Maricopa Defendants agree that the  
16 deadline for parties to file replies to the Statement should be extended from March 1, 2025 to  
17 March 6, 2025 at 4:00 p.m.

18

19

20

21

22

23

24

25

26

27

28

1 **Stipulation**

2 1. Subject to the Court's approval, the Receiver and Maricopa Defendants, through  
3 their undersigned counsel, agree that the deadline for the Receiver and other parties to file replies  
4 to the Statement is extended, from March 1, 2025, to March 6, 2025 at 4:00 p.m.

5  
6 DATED: March 3, 2025

SAUL EWING LLP

7  
8 By: 

9 ZEV SHECHTMAN  
10 Attorneys for Phillip Christensen, as Receiver

11  
12 DATED: March 3, 2025

KELLER BENVENUTTI KIM LLP

13  
14 By: 

15 JANE KIM  
16 Attorneys for Maricopa Defendants

17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 **ORDER**

2 Pursuant to the stipulation of the Receiver and Maricopa Defendants, IT IS HEREBY  
3 ORDERED that deadline for the Receiver and other parties to file replies to the Statement is  
4 extended, from March 1, 2025, to March 6, 2025 at 4:00 p.m.

5  
6  
7 IT IS SO ORDERED.

8 Dated: March 5, 2025



9 

---

 UNITED STATES DISTRICT JUDGE

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28